

**IN THE UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

In re

Chapter 9

CITY OF DETROIT, MICHIGAN,

Case No. 13-53846

Debtor.

Hon. Thomas J. Tucker

**STIPULATION FOR AN ORDER GRANTING THE DETROIT POLICE
OFFICERS ASSOCIATION AN ALLOWED UNSECURED
CONVENIENCE CLAIM IN THE AMOUNT OF \$25,000 IN FULL
SATISFACTION OF CLAIM NO. 1854**

The City of Detroit, Michigan (“City”) and the Detroit Police Officers Association (“DPOA”) (collectively the “Parties”), by and through their undersigned counsel, hereby stipulate as follows:

WHEREAS, pursuant to Article 27 of the Parties’ prior collective bargaining agreement, the DPOA asserts that it advanced legal defense costs in the total amount of \$42,768.75 (the “Defense Costs”). The DPOA asserts that the City is obligated to reimburse it for the Defense Costs pursuant to Article 27 terms of the Parties’ prior collective bargaining agreement;

WHEREAS, the DPOA asserts that the Defense Costs were outstanding on July 18, 2013, when the City commenced this case under chapter 9 of title 11 of the Bankruptcy Code;

WHEREAS, on February 20, 2014, the DPOA filed Claim No. 1854, asserting its right to the Defense Costs;

WHEREAS, on October 22, 2014, the City filed the Eighth Amended Plan for the Adjustment of Debts of the City of Detroit [Doc. No. 8045] (“Plan”). This Court subsequently issued an Order confirming the Plan on November 12, 2014 [Doc. No. 8272];

WHEREAS, the Parties believe that a consensual resolution of Claim No. 1854 is in the best interest of the Parties;

NOW THEREFORE, the Parties consent to the entry of the Order attached hereto as Exhibit A, granting the DPOA an unsecured Class 15 Convenience Claim under the Plan in the amount of \$25,000 in full satisfaction of Claim No. 1854. Parties further agree (a) that Claim No. 1854 will be treated in accordance with Class 15 of the Plan and (b) the distribution on Claim No. 1854 under the Plan will be paid to the DPOA.

August 23, 2017

STIPULATED AND AGREED:

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EXHIBIT A

**IN THE UNITED STATES BANKRUPTCY COURT
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**ORDER GRANTING THE DETROIT POLICE OFFICERS ASSOCIATION
AN ALLOWED UNSECURED CONVENIENCE CLAIM IN THE AMOUNT
OF \$25,000 IN FULL SATISFACTION OF CLAIM NO. 1854**

This matter is before the Court on the Stipulation for Entry of an Order Granting the Detroit Police Officers Association an Allowed Unsecured Convenience Claim in the Amount of \$25,000 in Full Satisfaction of Claim No. 1854 (the “Stipulation”)¹ filed by the City of Detroit (“City”) and the Detroit Police Officers Association (“DPOA”). The Court has reviewed the Stipulation, is otherwise fully advised in the premises and finds good cause for the relief granted herein:

¹ Capitalized terms not otherwise defined in this Order shall have the meanings ascribed to them in the Stipulation.

THEREFORE, IT IS HEREBY ORDERED that DPOA is granted an allowed Convenience Claim under the Plan in the amount of \$25,000, which shall be treated in accordance with Class 15 of the Plan (the “Allowed Claim”).

IT IS FURTHER ORDERED that the distribution on the Allowed Claim is in full satisfaction of Claim No. 1854.

IT IS FURTHER ORDERED that Claim No. 1854 is to be paid to the DPOA.

IT IS FURTHER ORDERED that, except for the relief granted by this Order, all of the DPOA’s Claims against the City arising from or related to Claim No. 1854 are hereby released and resolved.

IT IS FURTHER ORDERED that this Court retains jurisdiction over any and all matters arising from the interpretation or implementation of this Order.